

Scott,

ADMINISTRATIVE RECORD
SF FILE NUMBER
1170100

0150007

PRP examples.

you will give a statement
of work to Jacobs. One of
the tasks in that SOW
will include preparation of
a work plan for the PRP
search.

They will submit the work
plan to you, you will
approve/disapprove it, & then
they will start the PRP
search.

Kathy

Telecopier Request REGION VIII

0150008

GENE

NAME: JIM DUNN (TELEPHONE: 505-5414)
ADDRESS: EPA MONTANA OFFICE
CITY: HELENA STATE: MT
MAGNAFAX TELEPHONE NO.: 505-5260
SPECIAL INSTRUCTIONS: CALL J. DUNN UPON RECEIPT
REQUESTED BY (name): JOHN F. WARDLE
FROM:
NAME: JOHN F. WARDLE
ADDRESS: EPA SUPERFUND PROGRAM, REGION VIII
CITY: DENVER STATE: CO
SUBJECT: EAST HELENA SMELTER
PHONE: (303) 327-6238
☒ CHECK IF SUPERFUND TIME REQUIRED: _____

NUMBER OF PAGES TO FOLLOW: 4

FOR ASSISTANCE: 8-327-3180

DATE SENT: _____

TIME: _____

EPA RS-8000-2(6/75)

(REV 6/77)

PREVIOUS EDITION IS OBSOLETE

Donna Toeroek,
Regional Mgr.,
Jacobs

Mell Roy, Atty

Work Assignment
Form & SOW

ASAP

DATE

SUBJECT

Authorization to Proceed with Remedial
Investigation and Feasibility Study at
the East Helena Smelter Site, Montana
ACTION MEMORANDUM

FROM

William M. Hedeman, Jr., Director
Office of Emergency and Remedial
Response (WH-548)

TO

Lee Thomas
~~Acting~~ Assistant Administrator for Solid
Waste and Emergency Response (WH-562-A)

WORKING DRAFT

This memorandum requests authorization to conduct a remedial investigation and feasibility study at the East Helena smelter site, East Helena, Montana. The Environmental Protection Agency will be the lead agency.

BACKGROUND:

The East Helena smelter site has been in operation for approximately 95 years. It is owned by ASARCO. This primary lead and zinc smelter has emitted particles containing heavy metals into the air during its years of operation. Some of these particles have settled onto the soils surrounding the plant.

Investigations which were conducted in East Helena under the air quality regulations and as part of the development of a State Implementation Plan (SIP), under the Clean Air Act for smelter facilities revealed a high level of lead, arsenic, cadmium, and possible other metals in the soil located within the area around the smelter.

The smelter site has been nominated to be included in the National Priorities List (NPL) update. The NPL update is presently scheduled to be announced on July 19, 1983. Using the Hazard Ranking System (HRS), this site scored sixty six.

Data obtained recently by EPA and the State of Montana indicate that an area of 8.4 square miles surrounding the smelter contains at least 1,000 part per million (ppm) of lead in the upper soil horizon.

The EPA Lead Smelter Task Force has recommended that soil lead values of 1,000 ppm or more warrant further investigation. The concerns are that the soil can be reentrained into the air as inhalable particles, can be directly ingested (especially by small children), and can possibly run off or leach metals into surface water and groundwaters.

A lead blood analysis in 1975 indicated that children in East Helena had elevated levels of lead in their blood.

Done to

WORKING DRAFT

* There are three ongoing efforts at the East Helena smelter. The Center for Disease Control (CDC), through an interagency agreement with EPA, will conduct a lead blood level study in 1 - 5 year old children in East Helena. The study is scheduled to begin in July and completed during the summer.

The Region is awarding a contract requiring preparation of a study plan outlining soils and crop sample locations, and sampling protocols; analytical protocols; quality control assurance procedures; assist field crews who conduct the study; and evaluation and report of the study findings.

The Region also received assistance from the USGS through interagency agreements. In the spring of 1983, USGS provided file data and information on wells within a three-mile radius of the ASARCO smelter site, evaluated the potential of using these wells in a comprehensive sampling investigation, recommended additional locations for groundwater sampling wells, reviewed surface water sampling locations proposed by EPA, and reviewed proposed sampling protocols. In May, the Region asked USGS to complete a surface water reconnaissance of the area and field inventory groundwater sampling wells surrounding the smelter. The work was scheduled to be completed in late July.

The three investigations were initiated to supplement a field investigation that ASARCO had indicated it would conduct in the summer of 1983. ASARCO, however, concluded that since EPA was doing substantial work at the site, it would cooperate with EPA in providing information, but not conduct its proposed study.

IMPORTANT POLICY ISSUES:

ISSUE--COMMUNITY RELATIONS:

A carefully implemented community relation plan will be essential at this site. The Center for Disease Control (CDC) blood level study of 1 - 5 year old children will either be completed or undertaken concurrently with our efforts. CDC's study will, as a minimum, focus attention on EPA's efforts. Actions of both agencies will need to be coordinated.

EPA has had community relations experience with lead smelters at Dallas, Texas. That experience should be used in developing a community relations plan for the East Helena smelter site.

PROPOSED PROJECT:

The remedial investigation and feasibility study will provide the information necessary to determine the type and extent of contamination surrounding the East Helena smelter site, and the appropriate corrective action.

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If the responsible party(ies) will not complete both design and implementation of the remedy selected by EPA, the agency should undertake these tasks and attempt to cost recover.

PROJECT COST AND SCHEDULE

<u>ITEM</u>	<u>ESTIMATED COST</u>	<u>DURATION (MONTHS)</u>
Remedial Investigation	\$ 375,000	9
Feasibility Study	\$ 125,000	6
<u>TOTAL ESTIMATED COST:</u>	\$ 500,000	

EPA will be the lead agency for the remedial investigation and feasibility study. A Remedial Action Master Plan (RAMP) has not been prepared for this site.

RECOMMENDATION:

This request has been coordinated with the appropriate Regional and Headquarters offices. I recommend that you authorize a total of \$500,000 to conduct a remedial investigation and feasibility study at the East Helena smelter site.

I am available to discuss this request in more detail at your convenience.

APPROVE: _____

DISAPPROVE: _____

DATE: _____

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